

## BILL OF COMPLAINT

Frédérick S. Nichols and  
Lillian C. Nichols, his wife

Vs.

Ada Boring and Harry G. Boring,  
her husband, Mary Nichols, widow  
of Seth H. Nichols, Jr., Seth H.  
Nichols III. single, Constance  
Ahrem and Henry Ahrem, her husband,  
Robert Nelson, husband of Gladys  
M. Nelson, dec'd, Millard Norwood  
and Grace Norwood, his wife, Margaret  
N. Phillips, Carroll R. Phillips, her  
husband, Clayton R. Nichols and Nora  
Nichols, his wife, Lily P. Stier,  
widow of J. Hugh Stier, H. Douglas  
Stier and Mary Stier, his wife,  
Helen H. Stier Kelly, widow of  
Ridgely P. Stier, Richard P. Kelly,  
her husband, Ann Stier Smith and Paul  
C. Smith, her husband, Dorothy Robson  
and Arthur Robson, her husband,  
Douglas G. Stier, infant, Kathleen  
Stier, his wife, Mary H. Stier, widow  
of C. Welling Stier, Calvert Roome Stier,  
and Virginia Stier, his wife, Florence  
Stevenson and William W. Stevenson, her  
husband, Frederick H. Stier and Elizabeth  
S. Stier, his wife, Robert Stier, single,  
Kenneth Stier and Cornelia C. Stier, his  
wife, Aline M. Cartier, widow, Horace Epes, Jr.,  
and Katherine Epes, his wife, Virginia Harper  
and Marion Harper, her husband, Glenda Epes,  
widow, Maxine Baker and John A. Baker, her  
husband, Ruth Lewis and Lawrence Lewis, her  
husband, Margaret Cooper Smith, divorced,  
Fredericka Jefferds and Robert C. Jefferds,  
her husband, Helen C. Metcalfe and J. Brown  
Metcalfe, her husband, Mary Cooper, widow of  
George S. Cooper, Jr., George S. Cooper, III. In-  
fant, Douglas M. Cooper, infant, Frank S.  
Goodwin and Patricia C. Goodwin, his wife,  
Erwin W. Goodwin and Maxine Goodwin, his wife,  
Mary M. Bonamy and Douglas Bonamy, her husband,  
Caroline F. Kuehnert, infant, Henry Clay Stier,  
III., and Margaret Stier, his wife, Edith Bushong,  
widow, Olivia C. Dulaney, single

No. 16217 Equity.

In the Circuit Court

for Frederick County.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Frederick S. Nichols and Lillian  
C. Nichols, his wife, respectfully represents unto your Honorable Court:

FIRST: That a certain Achsah L. Stier, late of Frederick  
County, Maryland, died December 1, 1914, testate, seized and possessed  
of two lots or parcels of real estate situate, lying and being in New  
Market District, Frederick County, Maryland, being known as 25 and 92,  
and being the same parcel of land conveyed to Achsah L. Stier by deed  
from John C. Motter, et. al. Trustees, dated March 5, 1890, and recorded